

EXHIBIT K

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN N-
NITROSODIMETHYLAMINE (NDMA)
CONTAMINATION PRODUCTS
LIABILITY LITIGATION

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: HON. ROBERT B. KUGLER
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: Civil No. 19-2875 (RBK/JS)
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THIS DOCUMENT RELATES TO: ALL CASES INVOLVING VALSARTAN

CASE MANAGEMENT ORDER #

- I. This Order applies to all cases pending in MDL No. 2875 involving valsartan and to all actions transferred to or directly filed in MDL No. 2875 after the date of this Order involving valsartan. This Order provides for interim scheduling deadlines applicable to certain parties and claims, and it is anticipated that further Orders will be entered addressing other parties and claims as the litigation proceeds.**

CASE MANAGEMENT SCHEDULE

| Deadline | Consumer Economic Loss | TPP Economic Loss | Medical Monitoring | Bodily Injury |
|------------------|--|---|---|----------------------|
| January 18, 2021 | Defendants commence depositions of putative consumer economic loss class representatives by this date. Plaintiffs commence depositions of corporate witnesses for API and finished dose manufacturer Defendants by this date. | Defendants commence depositions of Third-Party Payor economic loss class representatives by this date. | Defendants commence depositions of Medical Monitoring Class Representatives by this date. | |
| March 26, 2021 | Defendants' depositions and fact discovery of putative consumer economic loss class representatives completed. | Defendants' depositions and fact discovery of Third-Party Payor economic loss class representatives completed. | | |
| April 23, 2021 | Plaintiffs' completion of depositions of Defendants' corporate witnesses for designated manufacturer Defendants, depositions continue as to other manufacturer Defendants. | | | |
| April 30, 2021 | Plaintiffs' service of expert reports directed to consumer economic loss class actions. Plaintiffs' filing of consumer economic loss class certification motion | Plaintiffs' service of expert reports directed to Third-Party Payor class actions. Plaintiffs' filing of Third-Party Payor class certification motion. | | |

| Deadline | Consumer Economic Loss | TPP Economic Loss | Medical Monitoring | Bodily Injury |
|-----------------|--|--|---|--|
| May 31, 2021 | Defendants' service of expert reports directed to consumer economic loss class actions. Defendants' filing of opposition to Plaintiffs' consumer economic loss class certification motions. | Defendants' service of expert reports directed to Third-Party Payor class actions. Defendants' filing of opposition to Plaintiffs' Third-Party Payor class certification motions. | Defendants complete depositions and fact discovery of Medical Monitoring Class Representatives. | Defendants commence depositions of personal injury plaintiffs. |
| June 7, 2021 | Parties Commence depositions of consumer economic loss experts. | Parties Commence depositions of Third-Party Payor economic loss experts. | | |
| June 30, 2021 | Plaintiffs' service of rebuttal expert reports to Defendants' consumer economic loss expert reports (if necessary). | Plaintiffs' service of rebuttal expert reports to Defendants' Third-Party Payor expert reports (if necessary). | | |
| July 30, 2021 | Completion of Plaintiffs' and Defendants' consumer economic loss expert depositions. | Completion of Plaintiffs' and Defendants' Third-Party Payor expert depositions. | Plaintiffs' service of medical monitoring general causation expert reports. | Defendants complete depositions of personal injury plaintiffs. |
| August 30, 2021 | Plaintiffs serve replies in support of consumer economic loss class certification motion. Service of all <i>Daubert</i> motions directed to all consumer economic loss class certification experts. | Plaintiffs serve replies in support of Third-Party Payor class certification motion. Service of all <i>Daubert</i> motions directed to all Third-Party Payor economic loss class certification experts. | Defendants' service of medical monitoring general causation expert reports. | |

CASE MANAGEMENT ORDER #

| Deadline | Consumer Economic Loss | TPP Economic Loss | Medical Monitoring | Bodily Injury |
|--------------------|--|--|---|--|
| September 30, 2021 | Service of all opposition to <i>Daubert</i> motions directed to consumer economic loss class certification experts. | Service of all opposition to <i>Daubert</i> motions directed to Third-Party Payor economic loss class certification experts. | | Plaintiffs serve personal injury general causation expert reports. |
| October 15, 2021 | <i>Daubert</i> hearing on consumer economic loss experts (if required). Argument of consumer economic loss class certification motion (if required) | <i>Daubert</i> hearing on Third-Party Payor class experts (if required). Argument of Third-Party Payor class certification motion (if required) | | |
| October 30, 2021 | Pre-Trial Order Exhibit/Witness Lists/Deposition Designations For initial Class Trial | | | Defendants serve personal injury general causation expert reports. |
| November 29, 2021 | Commence initial consumer economic loss class trial. | | | |
| January 30, 2022 | | | Completion of depositions of all medical monitoring general causation experts. | Completion of depositions of all personal injury general causation experts. |
| February 28, 2022 | | | Service of all <i>Daubert</i> motions directed to medical monitoring general causation experts. | Service of all <i>Daubert</i> motions directed to personal injury general causation experts. |

| Deadline | Consumer Economic Loss | TPP Economic Loss | Medical Monitoring | Bodily Injury |
|----------------|------------------------|-------------------|---|--|
| March 30, 2022 | | | Service of all opposition to medical monitoring general causation <i>Daubert</i> motions. | Service of all opposition to personal injury general causation <i>Daubert</i> motions. |
| May 3, 2022 | | | <i>Daubert</i> hearing on medical monitoring general causation experts (if necessary) | <i>Daubert</i> hearing on bodily injury general causation experts (if necessary). |

II. MEET AND CONFER OBLIGATIONS.

Nothing in this Order is intended to limit the ongoing meet and confer obligations of the Parties.

The Court directs the Parties to continue to meet and confer as to discovery issues, and to continue to apprise the Court of any issues as soon as they arise.

III. AGREED EXTENSION OF DISCOVERY DEADLINES.

Nothing in this Order shall be interpreted to restrict the ability of the parties to stipulate in writing to an extension of discovery deadlines or to move for an extension of discovery deadlines as permitted by the Rules. If any discovery extension would adversely impact non-discovery deadlines in this case, the parties must obtain Court approval.

SO ORDERED this ____ day of November, 2020.

Hon. Robert B. Kugler
United States District Judge